



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor  
Toni Hardesty, Director

April 15, 2005

**Certified Mail No. 7000 1670 0013 8128 9212**

Greg Wood  
Woodgrain Millwork Inc.  
PO Box 9489  
Nampa, ID 83652

RE: Facility ID No. 027-00060, Woodgrain Millwork Inc. (Woodgrain), Nampa  
Final Permit Letter

Dear Mr. Wood:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-040036 to Woodgrain's facility in Nampa in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho). This permit is effective immediately and is based on your permit application received October 12, 2004.

This permit does not release Woodgrain from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Boise Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator  
Air Quality Division

MB/SYC/sd  
Enclosures

Permit No. P-040036



**Air Quality  
PERMIT TO CONSTRUCT**  
**State of Idaho  
Department of Environmental Quality**

**PERMIT No.:** P-040036

**FACILITY ID No.:** 027-00060

**AQCR:** 64

**CLASS:** SM80

**SIC:** 2431

**ZONE:** 11

**UTM COORDINATE (km):** 532.9 , 4827.8

**1. PERMITTEE**  
Woodgrain Millwork, Inc. – Nampa Facility

**2. PROJECT**  
Water-borne Prime Line

**3. MAILING ADDRESS**  
P.O. Box 9489

**CITY**  
Nampa

**STATE  
ID**

**ZIP**  
83652

**4. FACILITY CONTACT**  
Greg Wood

**TITLE**  
QA Manager

**TELEPHONE**  
(208) 467-5221

**5. RESPONSIBLE OFFICIAL**  
Mike Kemp

**TITLE**  
General Manager

**TELEPHONE**  
(208) 467-5221

**6. EXACT PLANT LOCATION**  
1201 West Karcher Road, Nampa, Idaho

**COUNTY**  
Canyon

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**  
Wood Doors and Millwork

**8. GENERAL CONDITIONS**

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.

  
**TONI HARDESTY, DIRECTOR  
DEPARTMENT OF ENVIRONMENTAL QUALITY**

**DATE ISSUED:** April 15, 2005

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## **Acronyms, Units, and Chemical Nomenclature**

acfm	actual cubic feet per minute
AQCR	Air Quality Control Region
Btu/hr	British thermal unit per hour
°F	degrees Fahrenheit
DEQ	Department of Environmental Quality
gal/hr	gallons per hour
gal/mo	gallons per month
gal/yr	gallons per year
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
MSDS	Material Safety Data Sheet
O&M	Operation & Maintenance
lb/gal	pounds per gallon
lb/VOC/lb coating	pounds of VOC per pound of coating
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
SM80	synthetic minor source with emissions greater than or equal to 80% of a Tier I operating permit major source threshold
UTM	Universal Transverse Mercator
VOC	volatile organic compound

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040036**

<b>Permittee:</b>	Woodgrain Millwork,	<b>Facility ID No.</b> 027-00060	<b>Date Issued:</b>	April 15, 2005
<b>Location:</b>	Nampa, Idaho			

**1. PERMIT TO CONSTRUCT SCOPE*****Purpose***

- 1.1 This PTC allows for the construction of a water-borne prime line at Woodgrain Millwork's, Nampa facility. This is the first PTC for this facility.

***Regulated Sources***

Table 1.1 lists all sources of regulated emissions in this PTC.

**Table 1.1 SUMMARY OF REGULATED SOURCES**

<b>Permit Section</b>	<b>Source Description</b>	<b>Emissions Control(s)</b>
2	<u>Prime Line</u> Type: Flat line Manufacturer: Woodgrain Model: WGSYS100111GA Maximum capacity: 11.5 gal/hr Normal maximum feed input: 9 gal/hr	Filter system (The integral filter system consists of two filters that are interlocked to the spraying system and are part of the original design. The spraying system cannot be run without these filters in place.)
2	<u>AES Infrared Drying System</u> Rated heat input capacity: 480,000 Btu/hr Exit gas temperature: 110 °F Exit gas volume: 4,000 acfm Fuel: natural gas	None

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**2. WATER BORNE PRIME LINE WITH AES INFRARED DRYING SYSTEM****2.1 Process Description**

The prime line will be used to apply water-borne primer to various substrates using an automated flat line finishing system. The maximum application rate of the prime line is 11.5 gal/hr. The process is limited by the drying capacity of the oven. Coated substrate is dried in an infrared 480,000 Btu/hr natural gas-fired oven known as the AES infrared drying system.

**2.2 Emissions Control Description**

Overspray from the prime line is controlled by an integral filter system consists of two filters that are interlocked to the spraying system. The spraying system cannot be run without these filters in place. The filters each have a PM capture efficiency of 99%. VOC emissions are uncontrolled.

***Emissions Limits*****2.3 Emissions Limits**

The VOC emissions from the prime line stack shall not exceed 77.85 tons per any consecutive 12-month period.

**2.4 Opacity Limit**

Emissions from any stack, vent, or functionally equivalent opening associated with the prime line shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by a certified observer in accordance with the procedures contained in IDAPA 58.01.01.625. If there are any excess emissions, they shall be reported in accordance with IDAPA 58.01.01.131.

***Operating Requirements*****2.5 Integral Filter System**

Within 60 days of issuance of this permit, the permittee shall have developed an O&M manual for the integral filter system based on the manufacturer's specifications and recommendations. The permittee shall operate and maintain the integral filter system in accordance with the O&M manual. The O&M manual and manufacturer's specifications shall be kept on site and made available upon DEQ representative's request. Once developed, a copy of the O&M manual shall be submitted to DEQ's Boise Regional Office at the following address:

Air Quality Permit Compliance  
Department of Environmental Quality  
Boise Regional Office  
1445 N. Orchard  
Boise, ID 83706

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**2.6 AES Infrared System**

The oven for AES infrared drying system shall be fired by natural gas exclusively.

***Monitoring and Recordkeeping Requirements*****2.7 Required Coating Monitoring Information**

The permittee shall monitor and record the following information for each and every coating used. Records of this information shall remain onsite for the most recent two-year period and shall be made available to DEQ representatives upon request.

- the coating product name and manufacturer
- the coating Material Safety Data Sheet (MSDS)
- the coating density, in lb/gal
- the coating VOC content, in percent by weight; or the coating VOC content, in lb VOC/lb coating
- the coating throughput each month and each year, in gal/mo and gal/yr

**2.8 VOC Emissions Monitoring**

Using the information monitored and recorded in Permit Condition 2.7, the permit shall calculate monthly and annually, the total VOC emissions to demonstrate compliance with Permit Condition 2.3. Annual emissions shall be determined by summing monthly emissions over the previous consecutive 12-month period. Records of this information shall remain onsite for the most recent two-year period and shall be made available to DEQ representatives upon request.

Each month, the permittee shall calculate the VOC emissions from the prime line using the following calculation method or DEQ approved alternative:

Monthly VOC emissions rate =  $\sum G_i \times W_i \times \text{VOC}_i \text{ content}$

Annual VOC emissions rate = sum of the monthly VOC emissions rate over the previous consecutive 12-month period.

$G_i$ : For each coating, the coating throughput for the previous month, in gal/mo

$W_i$ : For each coating, the density of coating  $G_i$ , in lb/gal

$\text{VOC}_i \text{ content}$ : For each coating, the VOC content of coating  $G_i$ , in percent by weight VOC as indicated in the MSDS provided by the coating manufacturer; or the VOC content of coating  $G_i$ , in lb VOC/lb of coating as indicated in the MSDS provided by the coating manufacturer

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**3. PERMIT TO CONSTRUCT GENERAL PROVISIONS**

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
  - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
  - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within 5 working days after occurrence:
  - Initiation of Construction - Date
  - Completion/Cessation of Construction - Date
  - Actual Production Startup - Date
  - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.



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Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.